

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

LAILA ALIZADEH, an individual,  
SKYMARK PROPERTIES  
CORPORATION, INC.,  
a Delaware corporation,  
LIBERTY & YORK, INC, a Delaware  
corporation, SKYMARK  
PROPERTIES II, LLC, a Michigan  
limited liability company, SKYMARK  
PROPERTIES III, LLC, a Michigan  
limited liability company, SKYMARK  
SPE, LLC, a Delaware limited liability  
corporation, and 2399021 Ontario, Inc., a  
Canadian corporation,

Plaintiffs,

vs.

MORTEZA KATEBIAN, an individual,  
PAYAM KATEBIAN, an individual,  
MORROW GA INVESTORS, LLC, a  
Delaware limited liability company,  
2638168 ONTARIO, INC., a Canadian  
corporation, FLEMINGTON CAPITAL  
CORPORATION, a Delaware  
corporation, JORDAN ASHER  
SAMUEL, a Canadian individual,  
PANTER SAHEBDIVANI, a Canadian  
individual, HOSEINALI  
SAHEBDIVANI, a Canadian individual,  
ALI BEHROUZ, a Canadian individual,  
and GREEN LAKE REAL ESTATE  
FUND, LLC, a Delaware limited liability  
company,

Defendants.

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Civil Action No. 2:20-cv-12372

Hon. Sean F. Cox

Magistrate Judge David R. Grand

## DECLARATION OF TROY WILSON


Troy Wilson, under penalty of perjury declare that I have prepared and read the foregoing and that it is true and correct to the best of my information and belief:

1. I, Troy Wilson, am a resident of Elliot Lake, Ontario, Canada. I am a consultant representative for various corporations owned by Laila Alizadeh. I manage litigations for these companies and as such I am familiar with the costs associated with the various litigations.

2. On February 16<sup>th</sup>, 2023 our Ontario counsel Symon Zucker was forced to attend a hearing in Toronto Ontario to argue the letter rogatory matter on our behalf. Mr. Zucker faced considerable opposition on that day however he did prevail and the letter rogatory application was issued by the Ontario court.

3. I have now received the final invoice from Mr. Zucker with costs totaling \$87,998.01 directly related to the letter rogatory matter.

FURTHER DECLARANT SAYETH NOT



Troy Wilson

Dated: March 13, 2023

**SYMON ZUCKER PROFESSIONAL CORPORATION**

Barristers & Solicitors  
375 University Avenue, Suite 701  
Toronto, ON M5G 2J5

Ph:416-863-9955

Fax:1-855-696-5441

Troy Wilson

March 13, 2023

File #:

Inv #:

**RE: Skymark Properties et al ats. 63263101 Canada Inc. et al - Court File  
No.: CV-21-664559-0000**

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Nov-18-22	[REDACTED]		450.00	SZ
Nov-21-22	[REDACTED]		1,500.00	SZ
	[REDACTED]		140.00	BE
Nov-24-22	[REDACTED]		20.00	BE
Nov-25-22	[REDACTED]		20.00	BE
Nov-30-22	[REDACTED]		2,100.00	SZ

	[REDACTED]	40.00	BE
	[REDACTED]		
Dec-07-22	[REDACTED]	825.00	SZ
	[REDACTED]		
	[REDACTED]	160.00	BE
	[REDACTED]		
Jan-06-23	[REDACTED]	300.00	SZ
	[REDACTED]		
Feb-01-23	[REDACTED]	2,475.00	SZ
	[REDACTED]		
	[REDACTED]		
Feb-07-23	[REDACTED]	562.50	SZ
	[REDACTED]		
Feb-08-23	[REDACTED]	3,450.00	SZ
	[REDACTED]		
Feb-09-23	[REDACTED]	150.00	SZ
	[REDACTED]		
	[REDACTED]	60.00	BE
	[REDACTED]		
	[REDACTED]		
Feb-10-23	[REDACTED]	1,020.00	BE
	[REDACTED]		
	[REDACTED]		
Feb-11-23	[REDACTED]	6,150.00	SZ
	[REDACTED]		
Feb-12-23	[REDACTED]	6,225.00	SZ
	[REDACTED]		
Feb-13-23	[REDACTED]	6,600.00	SZ
	[REDACTED]		
Feb-14-23	[REDACTED]	5,475.00	SZ
	[REDACTED]		

Feb-15-23	[REDACTED]	6,900.00	SZ
	[REDACTED]		
	[REDACTED]	240.00	BE
Feb-16-23	[REDACTED]	5,475.00	SZ
Feb-21-23	[REDACTED]	2,625.00	SZ
	[REDACTED]	20.00	BE
	[REDACTED]	1,120.00	LP
Feb-22-23	[REDACTED]	220.00	BE
	[REDACTED]	40.00	BE
Feb-28-23	[REDACTED]	225.00	SZ
Mar-06-23	[REDACTED]	1,800.00	SZ
Mar-07-23	[REDACTED]	375.00	SZ
	[REDACTED]	80.00	BE
Mar-09-23	[REDACTED]	150.00	SZ

	[REDACTED]	[REDACTED]	225.00	SZ
	[REDACTED]	[REDACTED]	20.00	BE
Mar-12-23	[REDACTED]	[REDACTED]	825.00	SZ

<b>Totals</b>	<b>86.75</b>	<b>\$58,062.50</b>
HST on Fees		\$7,548.13

**Total Fees, Disbursements & HST** **\$65,610.63**

Previous Balance \$22,387.38

Previous Payments \$0.00

**Balance Due Now** **\$87,998.01**

Total Tax: \$7,548.13

HST #: 806958484 RT0001

\* tax-exempt